

Sage Legal LLC

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July 3, 2025

VIA ECF

United States District Court
Southern District of New York
Attn: Hon. Lewis J. Liman, U.S.D.J.
500 Pearl Street
Courtroom 15C
New York, NY 10007-1312

Re: Legacy Restoration, LLC v. Barajas, *et al.*
Case No.: 1:25-cv-5319 (LJL) (OTW)

Dear Judge Liman:

This firm represents Defendants Oswaldo “Junior” Barajas (“Barajas”), Leah Raffles (“Raffles”), and Brian Wolff (“Wolff”) (Barajas, Raffles, and Wolff collectively hereinafter the “Defendants”) in the above-referenced case. Because Plaintiff filed its motion by appending it to a letter, Defendants are regrettably forced to follow suit, as they are unable to “append” the opposition papers to any motion event in the CM/ECF system. Enclosed herewith, Defendants respectfully submit their memorandum of law and the declarations of Barajas, Raffles (with an accompanying exhibit), and Wolff in opposition to Plaintiff’s motion for a preliminary injunction.

Defendants thank this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
July 3, 2025

Respectfully submitted,

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.
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